



October 13, 2022

Washington State Building Code Council
1500 Jefferson St, SE
Olympia, Washington 98501

Chair Doan and Members of the State Building Code Council:

We, the undersigned affordable housing advocates, service providers and developers write to urge you to adopt the proposed residential building code updates. In particular, we strongly support the requirements for heat pump systems in new homes and stricter ventilation for gas stoves.

Building Healthy Homes

Last summer, Washington experienced a record breaking heat wave. While everyone in the Pacific Northwest was adversely affected, those living without proper shelter or in inadequately insulated or air conditioned homes suffered the most. With an estimated 600 heat-related deaths in the greater PNW region, this climate-fueled event was a wake-up call for communities in Washington.¹ While a code passed today will not prevent a deadly heat wave tomorrow, we can begin to address our climate crisis by building homes that will protect vulnerable people far into the future.

Affordable housing advocates have known for some time that environmental justice, housing, and racial justice are inextricably connected. We don't just want to build adequate housing, but resilient, healthy, sustainable homes. This means:

- Building all-electric homes to reduce indoor and outdoor air pollution and the associated health risks caused by fossil fuels and unhealthy air quality.
- Building homes that are made safer by not connecting them to gas lines, which can leak and explode. A recent study in *Environmental Science and Technology* found that the

¹ Nadja Popovich and Winston Choi-Schagrinm "Hidden Toll of the Northwest Heat Wave: Hundreds of Extra Deaths," *New York Times*, August 11, 2021.
<https://www.nytimes.com/interactive/2021/08/11/climate/deaths-pacific-northwest-heat-wave.html>

rate of gas leaks in a city was higher in areas with majority people of color and in lower-income areas.²

- Building all-electric homes with air conditioning to protect vulnerable populations from extreme heat. By installing electric heat pumps, we are automatically providing efficient heating and cooling.
- And building homes that will contribute to the climate goals of the state as a whole to ensure that current and future generations are protected from extreme weather, exposure, and distress caused by climate change.

In order to meet these standards, we need to be building new residential homes that are fossil-fuel free and maximize energy efficiency.

Building More Affordable Homes

The residential energy code impacts how we build a large portion of our state's affordable housing, as the code applies to low-rise (3 stories and under) multi-family buildings, single-family homes, and townhouses. There is an ever-growing need for more affordable housing options as the housing market continues to surge, causing rental prices to increase exponentially and exacerbating our state's homelessness crisis. According to the National Low Income Housing Association, as of 2022 Washington has a shortage of 158,225 homes available for extremely low income renters in Washington.³ While critics may cite this increasing demand for housing as a reason *not* to alter the energy code, we argue that it is precisely because of the increasing need for new affordable housing that we must build resilient homes for a sustainable future. Studies have shown that eliminating gas in new homes will reduce both construction costs and save consumers expenses over time.⁴ To ensure that Washington achieves both its climate and housing goals, we must use clean energy technologies to reduce pollution, reduce ongoing energy costs, and mitigate the near and long-term effects of climate change.

From an economic, equity, and sustainability perspective, it makes sense to build efficient, electric homes. By expanding on the recently passed heat pump requirements in the

² Li Cohen, "A 'disturbing inequality': Natural gas leaks disproportionately affect low-income neighborhoods and communities of color, study shows," May 11, 2022. *CBS News*. <https://www.cbsnews.com/news/natural-gas-leaks-low-income-communities-of-color-study/>

³ "2022 Washington Housing Profile," National Low Income Housing Coalition: https://nlihc.org/sites/default/files/SHP_WA.pdf

⁴ RMI has recently completed an update [cost benefit analysis](#) and found that all-electric homes cost less to build than mixed fuel homes in both Seattle and in Spokane. A 2,400 sq ft code compliant mixed fuel home (with an air conditioner for cooling) costs \$7,587 more than a code compliant all-electric buildings in Seattle; In Spokane a code compliant mixed fuel buildings cost \$7,248 more than an all-electric home.. These upfront cost savings are for three reasons:

- Heat pumps can both heat and cool, avoiding the need for separate equipment (an AC and a furnace)
- All-electric buildings don't need to install gas infrastructure inside and outside of the building
- Mixed fuel homes are required to achieve additional energy efficiency credits in section R406 to comply with the code, which adds thousands of dollars of construction costs.

commercial building code to include residential new construction, we are demonstrating our commitment to making the benefits of clean energy technologies accessible and equitable.

All Washington residents should be able to live in safe, healthy, affordable homes in sustainable and resilient communities. Thank you for your efforts to advance a building energy code that creates a healthy and sustainable future for all.

Sincerely,

Patience Malaba, Executive Director, Housing Development Consortium

Kathleen Hosfeld, Executive Director, Homestead Community Land Trust

Carly Colgan, CEO, South Puget Sound Habitat for Humanity

James Mateson, Policy Liaison, Earth Homes, LLC

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Ryan Donohue, Chief Advocacy Officer, Habitat for Humanity Seattle-King & Kittitas Counties

Steve Gelb, NW Regional Director, Emerald Cities Collaborative

And the following individuals:

Dick Lilly, Retired former City of Seattle employee

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